

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**THIRTY THIRD MONTHLY FEE STATEMENT OF FTI CONSULTING, INC. FOR
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES INCURRED AS FINANCIAL ADVISOR TO THE AD HOC COMMITTEE
OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION CLAIMANTS FOR
THE PERIOD FROM JUNE 1, 2022 THROUGH JUNE 30, 2022**

Name of Applicant:	FTI Consulting, Inc.
Authorized to provide Professional Services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 [ECF No. 553]
Period for which compensation and reimbursement is sought:	June 1, 2022 through June 30, 2022
Monthly Fees Incurred:	\$53,624.00

1. The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifesciences Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Monthly Expenses Incurred: \$0.00

Total Fees and Expenses Due: \$53,624.00

This is a: X monthly _____interim _____final application

PRIOR APPLICATIONS:

Docket No./Filed	Compensation Period	Requested		Approved	
		Fees	Expenses	Fees	Expenses
Docket No. 635 Filed On 12/9/2019	9/19/2019 – 10/31/2019	\$778,791.50	\$680.61	\$771,291.50	\$680.61
Docket No. 741 Filed On 1/13/2020	11/1/2019 – 11/30/2019	\$827,575.00	\$899.41	\$820,075.00	\$899.41
Docket No. 852 Filed on 2/20/2020	12/1/2019 – 12/31/2019	\$802,036.50	\$2,284.19	\$794,536.50	\$2,284.19
Docket No. 916 Filed on 3/12/2020	1/1/2020 – 1/31/2020	\$774,662.00	\$11,530.84	\$767,162.00	\$11,530.84
Docket No. 1090 Filed on 4/27/2020	2/1/2020 – 2/29/2020	\$615,089.00	\$6,141.22	\$610,714.00	\$6,141.22
Docket No. 1171 Filed on 5/19/2020	3/1/2020 – 3/31/2020	\$561,863.50	\$67.08	\$557,488.50	\$67.08
Docket No. 1251 Filed on 6/10/2020	4/1/2020 – 4/30/2020	\$428,303.00	\$1,732.28	\$423,928.00	\$1,732.28
Docket No. 1379 Filed on 7/13/2020	5/1/2020 – 5/31/2020	\$303,367.00	\$4,325.26	\$298,992.00	\$4,325.26
Docket No. 1651 Filed on 9/2/2020	6/1/2020 – 6/30/2020	\$374,753.00	\$96.90	\$372,253.00	\$ 96.90
Docket No. 1725 Filed on 9/25/2020	7/1/2020 – 7/31/2020	\$446,975.50	\$0.00	\$444,475.50	\$0.00
Docket No. 1850 Filed on 10/26/2020	8/1/2020 – 8/31/2020	\$261,092.00	\$108.25	\$258,592.00	\$108.25
Docket No. 1950 Filed on 10/26/2020	9/1/2020 – 9/30/2020	\$357,546.50	\$0.00	\$355,046.50	\$0.00
Docket No. 2031 Filed on 11/24/2020	9/19/2019 – 9/30/2020	\$44,462.00	\$0.00	\$41,462.60	\$0.00
Docket No. 2154 Filed on 12/18/2020	10/1/2020 – 10/31/2020	\$356,078.50	\$0.00	\$353,078.50	\$0.00
Docket No. 2308 Filed on 1/20/2021	11/1/2020 – 11/30/2020	\$450,827.00	\$0.00	\$447,827.00	\$0.00
Docket No. 2503 Filed on 3/17/2021	12/1/2020 – 12/31/2020	\$308,146.00	\$0.00	\$305,146.00	\$0.00
Docket No. 2504 Filed on 3/17/2021	1/1/2021 – 1/31/2021	\$493,773.50	\$0.00	\$490,773.50	\$0.00
Docket No. 2848 Filed on 5/12/2021	2/1/2021 – 2/28/2021	\$381,199.00	\$9.99	\$377,458.99	\$9.99
Docket No. 2849 Filed on 5/12/2021	3/1/2021 – 3/31/2021	\$513,645.00	\$0.00	\$509,895.00	\$0.00
Docket No. 3017 Filed on 6/11/2021	4/1/2021 – 4/30/2021	\$415,904.00	\$0.00	\$412,154.00	\$0.00
Docket No. 3225 Filed on 7/15/2021	5/1/2021 – 5/31/2021	\$363,711.00	\$40.00	\$360,001.00	\$40.00
Docket No. 3747 Filed on 9/9/2021	6/1/2021 – 6/30/2021	\$303,427.50	\$0.00	\$299,677.50	\$0.00

PRIOR APPLICATIONS (cont.):

Docket No./Filed	Compensation Period	Requested		Approved	
		Fees	Expenses	Fees	Expenses
Docket No. 3798 Filed on 9/21/2021	7/1/2021 – 7/31/2021	\$431,630.50	\$135.81	\$427,880.50	\$135.81
Docket No. 3941 Filed on 10/14/2021	8/1/2021 – 8/31/2021	\$284,159.00	\$20.94	\$280,409.00	\$20.94
Docket No. 4097 Filed on 11/11/2021	9/1/2021 – 9/30/2021	\$244,958.50	\$0.00	\$241,208.50	\$0.00
Docket No. 4225 Filed on 12/15/2021	10/1/2021 – 10/31/2021	\$368,998.50	\$40.00	\$367,498.50	\$40.00
Docket No. 4311 Filed on 1/26/2022	11/1/2021 – 11/30/2021	\$255,094.50	\$1,160.04	\$253,594.50	\$1,160.04
Docket No. 4312 Filed on 1/26/2022	12/1/2021 – 12/31/2021	\$192,786.50	\$0.00	\$191,286.50	\$0.00
Docket No. 4395 Filed on 2/25/2022	1/1/2022 – 1/31/2022	\$314,564.00	\$0.00	\$313,064.00	\$0.00
Docket No. 4654 Filed on 4/12/2022	2/1/2022 – 2/28/2022	\$181,198.50	\$8.00	\$178,888.84	\$8.00
Docket No. 4826 Filed on 5/16/2022	3/1/2022 – 3/31/2022	\$267,504.00	\$44.03	\$265,194.33	\$44.03
Docket No. 4833 Filed on 5/16/2022	4/1/2022 – 4/30/2022	\$175,704.00	\$0.00	\$173,394.33	\$0.00
Docket No. 4950 Filed on 7/12/2022	5/1/2022 – 5/31/2022	\$98,099.50	\$0.00	\$78,479.60	\$0.00

Note: The fee examiner's agreed upon reductions of \$30,000, \$17,500, \$10,000, \$15,000, \$15,000, \$15,000, \$6,000, and \$6,929 were allocated evenly across fees from the first, second, third, fourth, fifth, sixth, seventh, and eighth interim period, respectively.

This statement (the “**Fee Statement**”) of FTI Consulting, Inc. (together with its wholly owned subsidiaries and independent contractors, “**FTI**”) as financial advisor to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants of Purdue Pharma L.P., *et al.* (the “**Committee**”) is submitted in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [ECF No. 529] and the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* [ECF No. 553] entered on November 21, 2019 and December 2, 2019, respectively, (the “**Orders**”). In support of this Fee Statement, FTI respectfully states as follows.

1. The fees and expenses for the period from June 1, 2022 through and including June 30, 2022 (the “**Fee Period**”) amount to:

Professional Fees	\$53,624.00
Expenses	<u>0.00</u>
TOTAL	<u>\$53,624.00</u>

2. If no timely and proper objection is made by a party-in-interest within fourteen (14) days after service of this Fee Statement, the Debtors are authorized to pay 80% of professional fees and 100% of out-of-pocket expenses. These amounts are presented below.

Professional Fees at 80%	\$42,899.20
Expenses at 100%	<u>0.00</u>
TOTAL	<u>\$42,899.20</u>

3. The professionals providing services, hourly billing rates, the aggregate hours worked by each professional, and the aggregate hourly fees for each professional during the Fee Period are set forth on the schedule annexed hereto as **Exhibit “A”**.
4. A summary of aggregate hours worked and aggregate hourly fees for each task code during the Fee Period is set forth on the schedule annexed hereto as **Exhibit “B”**.

5. Detailed time entry by task code during the Fee Period is set forth on the schedule annexed hereto as **Exhibit “C”**.
6. FTI reserves the right to request, in subsequent fee statements and applications, reimbursement of any additional expenses incurred during the Fee Period, as such expenses may not have been captured to date in FTI’s billing system.

NOTICE AND OBJECTION PROCEDURES

7. Objections to this Fee Statement, if any, must be filed with the Court and served upon the Notice Parties so as to be received no later than August 22, 2022 (the “**Objection Deadline**”), setting forth the nature of the objection and the amount of fees or expenses at issue (an “**Objection**”).
8. If no objections to this Fee Statement are filed and served as set forth above, the Debtors shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified herein.
9. If an objection to this Fee Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such an objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

Dated: New York, New York
August 8, 2022

FTI CONSULTING, INC.
Financial Advisors to the Ad Hoc Committee of
Governmental and Other Contingent Litigation
Claimants of Purdue Pharma L.P.

By: /s/ Matthew Diaz
Matthew Diaz, Senior Managing Director
1166 Avenue of the Americas, 15th Floor
New York, New York 10036
Telephone: (212) 499-3611
Email: matt.diaz@fticonsulting.com

EXHIBIT A**PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649****SUMMARY OF HOURS BY PROFESSIONAL****FOR THE PERIOD JUNE 1, 2022 TO JUNE 30, 2022**

Professional	Position	Specialty	Billing Rate	Total Hours	Total Fees
Diaz, Matthew	Sr Managing Director	Restructuring	\$ 1,200	14.9	\$ 17,880.00
Simms, Steven	Sr Managing Director	Restructuring	1,325	1.7	2,252.50
Bromberg, Brian	Sr Director	Restructuring	890	19.6	17,444.00
Kurtz, Emma	Sr Consultant	Restructuring	655	24.5	16,047.50
GRAND TOTAL				60.7	\$ 53,624.00

EXHIBIT B**PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649****SUMMARY OF HOURS BY TASK****FOR THE PERIOD JUNE 1, 2022 TO JUNE 30, 2022**

Task Code	Task Description	Total Hours	Total Fees
1	Current Operating Results & Events	11.4	\$ 9,374.50
2	Cash & Liquidity Analysis	1.8	2,160.00
7	Analysis of Domestic Business Plan	1.0	890.00
9	Analysis of Employee Comp Programs	8.0	7,021.00
11	Prepare for and Attend Court Hearings	1.5	1,123.50
16	Analysis, Negotiate and Form of POR & DS	30.8	28,283.50
24	Preparation of Fee Application	4.8	3,525.50
26	Analysis of Insurance Programs	1.2	1,068.00
28	Review of IAC Business Plan	0.2	178.00
GRAND TOTAL		60.7	\$ 53,624.00

EXHIBIT C

PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649

DETAIL OF TIME ENTRIES

FOR THE PERIOD JUNE 1, 2022 TO JUNE 30, 2022

Task Category	Date	Professional	Hours	Activity
1	6/1/2022	Kurtz, Emma	0.5	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/2/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/3/2022	Diaz, Matthew	0.6	Review of news articles and related case information.
1	6/3/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/6/2022	Diaz, Matthew	1.1	Review of Debtors' latest monthly operating results.
1	6/6/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/7/2022	Diaz, Matthew	0.4	Continue to review diligence on Debtors' latest operating results.
1	6/7/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/13/2022	Kurtz, Emma	0.6	Review recently uploaded dataroom documents re: reporting to share with team.
1	6/13/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/14/2022	Diaz, Matthew	0.9	Review Debtors' latest sales and cash reporting.
1	6/14/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/15/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/16/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/17/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/20/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/20/2022	Kurtz, Emma	0.3	Review recently uploaded dataroom documents re: reporting to share with team.
1	6/21/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/22/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/23/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/24/2022	Diaz, Matthew	0.5	Review Debtors' latest monthly operating results.
1	6/24/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/27/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/28/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/29/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	6/30/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1 Total			11.4	
2	6/2/2022	Diaz, Matthew	0.8	Review Debtors' cash reporting.
2	6/7/2022	Diaz, Matthew	0.4	Review Debtors' updated 13-week cash flow forecast.
2	6/22/2022	Diaz, Matthew	0.6	Review Debtors' latest budget to actual cash variance results.
2 Total			1.8	
7	6/24/2022	Bromberg, Brian	1.0	Review 2022 business plan provided by the Debtors.
7 Total			1.0	
9	6/7/2022	Bromberg, Brian	1.1	Review historical CEO KEIP info.
9	6/7/2022	Bromberg, Brian	0.6	Review slides on KEIP re: proposed CEO compensation.
9	6/7/2022	Bromberg, Brian	0.4	Review update for committee re: KEIP proposal to prepare changes.
9	6/7/2022	Bromberg, Brian	0.6	Review objections to proposed 2020 and 2021 KEIPs.
9	6/7/2022	Diaz, Matthew	0.4	Review draft KEIP slides for the committee.
9	6/7/2022	Kurtz, Emma	1.6	Prepare analysis of Purdue CEO compensation re: historical and proposed 2022 compensation.

EXHIBIT C

PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649

DETAIL OF TIME ENTRIES

FOR THE PERIOD JUNE 1, 2022 TO JUNE 30, 2022

Task Category	Date	Professional	Hours	Activity
9	6/7/2022	Kurtz, Emma	0.8	Prepare revisions to slides on CEO comp per internal comments.
9	6/8/2022	Bromberg, Brian	0.6	Participate in weekly committee call to discuss KEIP proposal.
9	6/8/2022	Bromberg, Brian	0.8	Prepare to present KEIP proposal analysis on committee call.
9	6/8/2022	Diaz, Matthew	0.6	Draft correspondence to the working group on the KEIP.
9	6/8/2022	Diaz, Matthew	0.5	Review analysis of proposed 2022 KEIP and comparison to prior KEIPs.
9 Total			8.0	
11	6/15/2022	Bromberg, Brian	0.6	Listen to KEIP hearing.
11	6/15/2022	Kurtz, Emma	0.9	Attend hearing re: CEO 2022 KEIP and interim fee applications.
11 Total			1.5	
16	6/1/2022	Bromberg, Brian	0.7	Prepare update for team re: strategic considerations.
16	6/1/2022	Bromberg, Brian	0.9	Review potential counterparty issues.
16	6/1/2022	Kurtz, Emma	1.6	Continue to prepare revisions to analysis of additional Sackler settlement agreement.
16	6/1/2022	Simms, Steven	0.4	Review updates from team re: strategic considerations.
16	6/2/2022	Bromberg, Brian	0.5	Discuss company strategic initiatives with Houlihan.
16	6/2/2022	Bromberg, Brian	0.6	Discuss company strategic initiatives with Debtors' advisors.
16	6/2/2022	Bromberg, Brian	1.6	Review updates to analysis of Sackler settlement agreement payments and related payment mechanics and examples.
16	6/2/2022	Bromberg, Brian	0.6	Summarize issues for team re: strategic initiatives.
16	6/2/2022	Diaz, Matthew	0.5	Review of next steps for certain strategic considerations.
16	6/2/2022	Kurtz, Emma	2.6	Prepare updates to analysis of payment mechanics reflecting additional Sackler settlement.
16	6/2/2022	Kurtz, Emma	2.8	Prepare updates to illustrative examples to include additional Sackler settlement.
16	6/3/2022	Bromberg, Brian	0.7	Review counterparties issues.
16	6/3/2022	Diaz, Matthew	0.6	Review of next steps on certain strategic considerations.
16	6/7/2022	Bromberg, Brian	0.3	Prepare notes on call with Debtors and other advisors.
16	6/7/2022	Bromberg, Brian	0.6	Participate in financial advisor call to discuss business operations.
16	6/7/2022	Bromberg, Brian	0.4	Discuss financial update from the Debtors with Houlihan.
16	6/7/2022	Bromberg, Brian	0.7	Summarize financial update for counsel.
16	6/7/2022	Diaz, Matthew	0.5	Review materials to prepare for call with the Debtors re: financial performance and emergence.
16	6/7/2022	Diaz, Matthew	0.6	Participate in call with the Debtors to discuss current financial items.
16	6/7/2022	Kurtz, Emma	0.5	Attend bi-weekly update call with the Debtors advisors.
16	6/7/2022	Simms, Steven	0.4	Review update from team re: call with the Debtors.
16	6/8/2022	Simms, Steven	0.5	Review status of case workstreams and emergence preparation.
16	6/9/2022	Diaz, Matthew	0.6	Review current open items and related next steps.
16	6/9/2022	Diaz, Matthew	0.4	Draft correspondence and coordination with the working group and company on certain issues.
16	6/16/2022	Diaz, Matthew	0.5	Participate in call with Alix to discuss the agenda for next week's meeting with the AHC and the Company.
16	6/17/2022	Bromberg, Brian	0.2	Review agenda for call with Debtors' management.
16	6/20/2022	Bromberg, Brian	0.6	Review Debtors' 2022 business plan to prepare for call with the Debtors.
16	6/20/2022	Bromberg, Brian	0.6	Review MDT agreement to prepare for call with the Debtors.
16	6/21/2022	Bromberg, Brian	1.3	Participate in call with the Committee and the Debtors re: financial results and projections and emergence preparation.
16	6/21/2022	Diaz, Matthew	1.2	Participate in call with the Company and Committee on the company operating results and emergence.
16	6/21/2022	Diaz, Matthew	0.7	Prepare for call on the Company's operating results.
16	6/21/2022	Kurtz, Emma	1.3	Attend call with the working group, Debtors and their advisors to discuss financial results and emergence preparations.
16	6/21/2022	Simms, Steven	0.4	Review update from team re: Debtors financial performance and emergence preparation.
16	6/22/2022	Bromberg, Brian	0.5	Discuss emergence issues with counsel.
16	6/22/2022	Bromberg, Brian	0.6	Follow up with Debtors on open questions.
16	6/22/2022	Bromberg, Brian	0.4	Review follow up materials from the Debtors.
16	6/22/2022	Diaz, Matthew	0.5	Review next steps to emerge, subject to the appeal.
16	6/22/2022	Kurtz, Emma	0.4	Attend call with Counsel and Houlihan to discuss emergence preparation and regulatory issues.
16	6/23/2022	Diaz, Matthew	1.3	Review summary of potential emergence issues.
16	6/28/2022	Bromberg, Brian	0.7	Review follow up materials re: emergence preparation.
16 Total			30.8	
24	6/17/2022	Kurtz, Emma	2.8	Prepare draft May fee application per fee examiner guidelines.

EXHIBIT C

PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649

DETAIL OF TIME ENTRIES

FOR THE PERIOD JUNE 1, 2022 TO JUNE 30, 2022

Task Category	Date	Professional	Hours	Activity
24	6/20/2022	Kurtz, Emma	1.3	Finalize draft May fee application per local rules.
24	6/24/2022	Diaz, Matthew	0.7	Review of the May bill.
24 Total			4.8	
26	6/21/2022	Bromberg, Brian	0.7	Review D&O insurance response from Debtors.
26	6/24/2022	Bromberg, Brian	0.5	Review follow-up D&O insurance response from Debtors.
26 Total			1.2	
28	6/28/2022	Bromberg, Brian	0.2	Review IAC diligence questions.
28 Total			0.2	
Grand Total			60.7	